

**DENIED**

Terry L. DOWDEN  
U.S. DISTRICT JUDGE  
UNITED STATES DISTRICT COURT  
TERRY L. DOWDEN, U.S. DISTRICT JUDGE  
DATE OF SOUTH CAROLINA

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BOOKS 1-4

2012 SEP 12 A 10:32

C.V.1 AD.DN NO: 4:11-cv-3362-TLW  
TER

Thomas Reginald Brooks

Plaintiff,

vs.

County of Richland South  
Carolina, et al

SOUTH CAROLINA DEPARTMENT  
OF CORRECTIONS, et al

Defendants,

MOTION FOR SPECIAL INTE-  
LOCUTORY ORDER TO INTERVENE  
~~IN~~ COLLATERAL MATTER OR  
BASES CONCERNING GROUNDS  
IN ABOVE CIVIL ACTION  
PENDING.

HERE IN all GROUNDS OF FACTS, SUSPICION, and  
~~believe~~ the plaintiff is enclosing a motion drafted  
by his P.C.L.J. atty., on JUNE 21, 2012, whom is ROBERT  
T. GRIECKLAND, atty., within "Barnes, Alford, Stark &  
Johnson, LLP," the grounds for this JUNE 21<sup>st</sup> 2012, mo-  
tion was for "Motion for Leave To Conduct Discovery,"  
on July 19<sup>th</sup> 2012, after a hearing before The Honorable James  
R. Barber III, presiding Judge, Fifth Judicial Circuit. As  
of todays date of 09-10-2012, grounds 5 thru 7, have not  
been disclosed to the atty., representing me in this post  
conviction matter. Per my atty., my P.C.L.J. hearing is  
scheduled for Sept. 14<sup>th</sup> 2012, at the "Richland County  
Judicial Center," on Main St. in downtown Columbia, in  
the Court of Common Pleas for Richland County.

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With a "Prima Facie" showing of the Plaintiff's  
ORDER Granting discovery their or reasonable  
facts and ~~beliefs~~, that the State is attempting  
to violate Petitioner's Rights pursuant to  
"Brady v. Maryland," and cover up the facts concerning  
the Appellant's grounds for disclosure of  
Grounds 3 thru 7, The Plaintiff's Grounds  
for current motions for Special Interlocutory Order  
to intervene in what is a obvious Conspiring  
and attempt to withhold evidence that is material  
in all phases of my rights to due process rather  
Criminal and or Civ. L. ~~The~~ withhold and or Tamper-  
ing and or destruction of material evidence that  
tends to exculpate a defendant in a Criminal  
Proceeding and ~~etc.~~ Impugn a witness against  
the defendant it's a Criminal act of Conspiracy  
~~etc.~~, and tends to pollute the demands for Just.  
ice and bring the admity of Justice into tor-  
moil. This information is needed to comply with  
the burden of proof required for the plaintiff  
to overcome the burden for the Grounds of p.c.R.,  
at this First Collateral mode of P.L.W. How  
can the ~~the~~ Applicant have the fair bite of  
the legal apple at this important stage to  
them as a Plaintiff in this Civ. L action

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have the full ~~guarants~~ of the Constitution such as for example to defend <sup>against any defense by the State at the</sup> doctrine of collateral estoppel,<sup>etc.</sup> if he is prejudiced ~~and~~ and limited to ~~etc.~~ establishing the requirements of Strickland v. Washington, Supra; State v. G. Brown, Supra etc., The plaintiff per se, asks that the jurisdiction of the Court wills Mercy to intervene in this matter to conduct discovery for the purpose of Civil actions number 4:11-CV-3362-TLW, with all due respect to the jurisdiction of the Court and the ethics involved as a matter of Justice and protecting interests to the pending matter of C.V.I Action Number 4:11-CV-3362-TLW, on the same grounds stated in P.C.R.; Civil Action No. 2011 CP-40-7395, to establish the plaintiff's immunities <sup>etc.</sup> to frivolous defenses such as the abated Stated Doctrine etc., The plaintiff, motions with all due respect and prays that this matter is addressed with the proper and best course that the law provides the people against the hands of corruption and illegal acts of Criminal activity by persons clothed with authority under color of state law. Finally, IN GOD WE TRUST ~~Respectfully~~

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~~Submitted.~~

Respectfully,

Sharon Reynolds Brooke

09-11-2012